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August 31, 2023

VIA CM/ECF

Judge Nina R. Morrison
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Windward Bora, LLC v. Dean Holding LLC et al*
Docket Number: 1:20-cv-02929-NRM-MMH

Dear Judge Morrison,

We represent the Plaintiff, Windward Bora LLC (“Plaintiff”), in the above-referenced matter. On August 31, 2023, the Court Ordered Plaintiff to confirm the citizenship of Defendant Amos Financial, LLC (“Amos”). As set forth below, Amos is a citizen of Illinois.

APPLICABLE LEGAL STANDARD

Whether federal diversity jurisdiction exists is determined by examining the citizenship of the parties at the time the action is commenced. *Linardos v. Fortuna*, supra. For the purposes of diversity, an LLC’s citizenship is determined by the citizenship of its members. *See Avant Capital Partners, LLC v. W108 Development LLC*, 387 F.Supp.3d 320 (S.D.N.Y. 2016); *see also Handelsman v. Bedford Vill. Assocs. Ltd. P’ship*, 213 F.3d 48, 51–52 (2d Cir. 2000) (holding “[F]or purposes of diversity jurisdiction, a limited liability company has the citizenship of its membership.”).

AMOS FINANCIAL LLC IS AN ILLINOIS LIMITED LIABILITY COMPANY

Amos is the only answering Defendant in this foreclosure action.

Amos is a citizen of Illinois. *See Avant Capital Partners, LLC v. W108 Development LLC*, supra. Amos’ counsel in another case admitted that Amos has only one member, and that the member is a citizen of Illinois. *See Id.* *See also*, i.e., **Exhibit A** which is a true and correct copy of a corporate disclosure statement filed in Southern District of Florida alleging that the sole member of Amos is a citizen of Illinois. *See also*, **Exhibit B** which is a true and correct copy of a Complaint filed against Amos (see paragraph 7 of the Complaint), along with Amos’ answer (see paragraph 1 of the Answer), which admits that Amos is an Illinois LLC.

Since the sole member of Amos is a citizen of Illinois, Amos is a citizen of Illinois.

CONCLUSION

Since the exhibits submitted reflect that the member of Amos is a resident of Illinois, the Court should find that Plaintiff met its burden of establishing complete diversity exists.

We thank the Court in advance for its time and consideration.

Respectfully,

HASBANI & LIGHT, P.C.

/s/ Danielle P. Light
Danielle P. Light, Esq.
Attorneys for *Plaintiff*